

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

TYLER JAMES LEVERETT (04)

No. 4:17-CR-198-A

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED
OCT 26 2017
CLERK, U.S. DISTRICT COURT
By _____ Deputy

FACTUAL RESUME

SUPERSEDING INFORMATION: Count One: Conspiracy to Possess with Intent to Distribute a Controlled Substance (methamphetamine) (in violation of 21 U.S.C. § 846, and 21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

PENALTY: \$5,000,000 fine - not less than 5 years imprisonment and not more than 40 years imprisonment, or both such fine and imprisonment, plus a term of supervised release of not less than 4 years.

MAXIMUM PENALTY:

\$5,000,000 fine and not less than five (5) years nor more than forty (40) years imprisonment, plus a term of supervised release of not less than 4 years. If the defendant violates any condition of supervised release, the Court may revoke such term of supervised release and require the defendant to serve an additional period of confinement. Further the Court must impose a Mandatory Special Assessment of \$100.00.

ELEMENTS OF THE OFFENSE:

The essential elements which must be proved beyond a reasonable doubt in order to establish the offenses charged in Count One of the Information are as follows:

First: That two or more persons, directly or indirectly, reached an agreement to distribute or possess with intent to distribute a controlled substance, as charged in the information;

Second: That the defendant knew of the unlawful purpose of the agreement;

Third: That the defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose; and

Fourth: That the overall scope of the conspiracy involved at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

STIPULATED FACTS:

T.L. 2016 and 2017 *Joseph Armstrong*
In 2014 and 2015, Tyler James Leverett received multi-ounce quantities of methamphetamine from ~~Haldon Stikeleather and Yvonne Hallien~~, often on consignment. In turn, Tyler James Leverett distributed methamphetamine to various customers in the Fort Worth, Texas area, returning to ~~Haldon Stikeleather and Yvonne Hallien~~ for additional methamphetamine. In this manner, Tyler James Leverett, ~~Haldon Stikeleather, and Yvonne Hallien~~ conspired with each other and others to possess with intent to distribute more than 50 grams of methamphetamine.

Joseph Armstrong
T.L.

Joseph Armstrong

T.L.

SIGNED this 6 day of October, 2017.

T.J. Leverett

TYLER JAMES LEVERETT
Defendant

JOEY MONGARAS
Counsel for Defendant